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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

October 1, 1999

**CERTIFIED MAIL**

Z 410 722 188

Ms. Susan Roth  
Roth Consulting  
6236 27<sup>th</sup> Avenue NE  
Seattle, WA 98115-7114

Dear Ms. Roth:

Re: Agency Approval for the Groundwater Monitoring Program Modifications to be  
Preformed Under Section V of the Terminal 91 Tank Farm Site Agreed Order

This correspondence serves as an official response by the Washington State Department of Ecology (Ecology), on the proposal for changes to the groundwater monitoring program requested in your letter dated September 17, 1999, as required under Section VII.6 of Agreed Order No. DE98HW-N108.

Ecology approves of the proposed changes to the groundwater monitoring plan which alters Section V of the Agreed Order accordingly. The proposed changes have been discussed during a meeting on August 10, 1999 with the PLP Group and only the changes noted within your September 17, 1999 correspondence are therefore approved for the Terminal 91 Tank Farm Site.

Beginning with the October 1999 groundwater-monitoring event, the PLP group may institute these changes to the groundwater-monitoring program for the Terminal 91 Tank Farm Site:

- Groundwater samples will be collected on a semiannual basis instead of the current quarterly sampling (note: The quarterly "status report" schedule will not change);
- Water levels and LNAPL thickness will be measured on a semiannual basis instead of the current quarterly sampling;
- Groundwater samples will not be collected from the eight monitoring wells that have been identified in the past or currently contain LNAPL. These eight wells are identified as CP-107, CP-109, CP-110, CP-116, CP-117, CP-118, CP-119 and MW-39-3;

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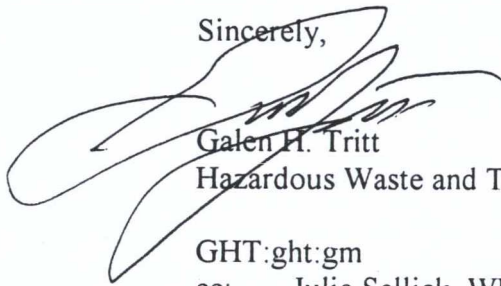


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- The remaining 19 monitoring wells will be analyzed for
  1. *Volatile Organic Compounds (VOCs)*
  2. *Semivolatile Organic Compounds (SVOCs)*
  3. *Volatile Petroleum Products (Gasoline), extended (NWTPH-Gx)*
  4. *Semivolatile Petroleum Products (Diesel), extended (NWTPH-Dx)*
  5. *Total Metals as Arsenic, Chromium, Lead, Mercury, and Zinc*
- Micropurging procedures will be used for removing groundwater from the monitoring wells; and
- Passive product recovery canisters will be installed in the eight monitoring well identified above as having contained LNAPL either in the past or currently.

If you have any questions or comments, please contact me by telephone at (425) 649-7280 or by email at [gtri461@ecy.wa.gov](mailto:gtri461@ecy.wa.gov).

Sincerely,



Galen H. Tritt  
Hazardous Waste and Toxics Reduction

GHT:ght:gm

cc: Julie Sellick, WDOE-NWRO  
Hideo Fujita, WDOE-NWRO  
Jan Palumbo, EPA Region 10  
HZW file 6.6.2.2